

HONE LAW

Jill Garcia, NV Bar No. 7805

jgarcia@hone.law

Eric D. Hone, NV Bar No. 8499

ehone@hone.law

701 N. Green Valley Parkway, Suite 200

Henderson, NV 89074

Phone 702-608-3720

Fax 702-608-7814

Attorneys for Defendants

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

DONAVAN McINTOSH,

Plaintiff,

vs.

CITY OF NORTH LAS VEGAS, a Municipal Corporation and political subdivision of the State of Nevada; PAMELA OJEDA in her official and/or individual capacities; CLINTON RYAN in his official and/or individual capacities; ALEJANDRO RODRIGUEZ in his official and/or individual capacities; DOES I-X,

Defendants.

Case No. 2:21-cv-01505-APG-EJY

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR DEFENDANTS
TO REPLY TO PLAINTIFF'S
OPPOSITION TO DEFENDANTS
MOTION FOR SUMMARY JUDGEMENT**

[SECOND REQUEST]

Defendants City of North Las Vegas, Pamela Ojeda, Clinton Ryan, and Alejandro Rodriguez ("Defendants") and Plaintiff Donovan McIntosh ("Plaintiff"), by and through their undersigned counsel, hereby file this Stipulation and Order to Extend Deadline for Defendants to Reply to Plaintiff's Opposition to Defendants' Motion for Summary Judgment (Second Request).

IT IS HEREBY STIPULATED AND AGREED that Defendants shall have a two week extension, up to and including March 27, 2023, to file their reply ("Reply") to Plaintiff's Opposition to Defendants' Motion for Summary Judgment ("Motion") filed on January 30, 2023 [ECF No. 49] ("Opposition"). The requested extension is sought in good faith and not for purposes of undue delay. This Stipulation is submitted and based upon the following:

1 Plaintiff's Opposition to Defendants' Motion was originally due on November 30, 2023.

2 An Order granting the stipulation and order (first request) filed on November 30, 2022
3 [ECF No.46] extending Plaintiff's deadline to file his Opposition to the Motion from November
4 30, 2022, to January 9, 2023.

5 On January 9, 2023, an Order granting the stipulation and order (second request) [ECF.
6 No. 48] extending Plaintiff's deadline to file his Opposition to the Motion from January
7 9, 2023, to January 23, 2023.

8 Plaintiff's opposition was filed on January 30th, 2023 [ECF No. 49]. The Court has
9 granted a retroactive extension. [ECF No. 50].

10 On February 8th, an Order granting the stipulation and order (first request) [ECF. No. 53]
11 extending Defendants deadline to file their Reply to Plaintiff's Opposition to Defendants Motion
12 for Summary Judgement to March 13, 2023.

13 Defendants counsel has pre-planned time off during the week of March 13, and, in light
14 of workload issues in other litigation matters, Defendants request the additional two weeks to
15 properly finalize their Reply to Plaintiff's Opposition to Defendants Motion for Summary
16 Judgement .

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///



1 This is the second request for an extension of time for Defendants to file a reply to
2 Plaintiff's Opposition to Defendants Motion for Summary Judgment.

3 **IT IS SO STIPULATED.**

4 Dated this 9th day of March 2023.

Dated this 9th day of March 2023.

5 HONE LAW

KEMP & KEMP, ATTORNEYS AT LAW

6 /s/ Jill Garcia

/s/ James P. Kemp

Jill Garcia, NV Bar No. 7805

James P. Kemp, NV Bar No. 6375

7 jgarcia@hone.law

jp@kemp-attorneys.com

Eric D. Hone, NV Bar No. 8499

7435 W. Azure Drive, Suite 110

8 ehone@hone.law

Las Vegas, NV 89130

701 N. Green Valley Parkway, Suite 200

9 Henderson, NV 89074

Attorneys for Plaintiff

10 *Attorneys for Defendants*

11
12 **IT IS SO ORDERED.**

13 Dated: March 10, 2023

14 

15 UNITED STATES DISTRICT JUDGE

